



Robert P. Astorino
County Executive

Office of the County Attorney

Robert F. Meehan
County Attorney

December 9, 2014

Via Fax: 914-390-4179

Hon. Nelson S. Romàn
United States District Judge
U.S. District Court
300 Quarropas Street
White Plains, New York 10601-4150

Re: Response to Order to Show Cause dated November 25, 2014 in Edward Morales v. SUNY Purchase College, et al. 14 CIV. 8193 (NSR)

Dear Judge Romàn,

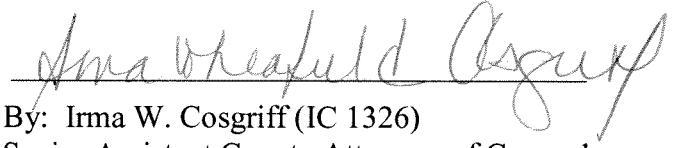
This Office represents defendants Westchester County District Attorney's Office and the County of Westchester (collectively "County Defendants"). We submit this letter at the direction of the Court in opposition to Plaintiff's Order to Show Cause dated November 25, 2014 in which he requests that the Court order the State University of New York and the New York State Attorney General's Office to refrain from "contacting Plaintiff's witnesses and/or any other of the Plaintiff's witnesses".

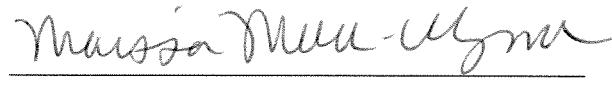
Plaintiff does not name County Defendants in the Order to Show Cause, and this office was never served in accordance with the directive of the Court. In addition, County Defendants do not have personal knowledge of the allegations contained in Plaintiff's Affidavit in support of his application. Nevertheless, to the extent that the Order dated November 25, 2014 requires County Defendants' position, we submit the following limited response.

Should this case proceed beyond a FRCP 12(b)(6) motion, County Defendants intend to defend this case vigorously, including but not limited to, requesting appropriate medical releases from Plaintiff and obtaining all relevant medical documentation and subpoenaing witnesses as necessary. In the interim, we intend to take all appropriate and necessary steps to defend this case and to protect County Defendants' interest within the confines of the law.

This office will be present at the Show Cause hearing scheduled for December 16, 2014 at 11a.m. unless directed otherwise by the Court. Should Your Honor's staff have any questions, we may be reached at the numbers below.

Respectfully submitted,
ROBERT F. MEEHAN
Westchester County Attorney


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IWC/MMW:st

cc: *Via Regular First Class Mail*
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Via ECF
Monica Connell, Esq.
Neil Torczyner, Esq.